

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Civil Division**

Ilya Braude
[REDACTED]

Plaintiff

v.

**Alla Vilnyanskaya
5061 Red Cloud Court, Apt 4
Oxford, Ohio 45056**

Defendant

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Case No.

REDACTED VERSION

CIVIL ACTION COMPLAINT

Plaintiff, by and through his undersigned counsel, files this action in response to the actions taken by Defendant. In support of his claims, Plaintiff avers the following:

I. PARTIES

1. Plaintiff Ilya Braude is a Maryland domiciliary residing in the county of [REDACTED]

[REDACTED] at the above-captioned address.

2. Defendant Alla Vilnyanskaya is, upon information and belief, an Ohio domiciliary residing at the above-captioned address.

II. JURISDICTION & VENUE

3. This Honorable Court has jurisdiction over the claims set forth herein pursuant to 28 U.S.C. § 1332 because the parties are citizens of different states and the amount in controversy exceeds \$75,000.

4. Venue lies in this District pursuant to 28 U.S.C. §§ 1391(b) and (c) because the Mr. Braude resides in this District, and the statements made by Ms. Vilnyanskaya had defamatory intent and effect within this District. Specifically, Mr. Braude suffered injury within this District.

III. FACTUAL BACKGROUND

5. Beginning in March 2009, the parties were engaged in a romantic relationship.

6. The romantic relationship between the parties continued for approximately eight months and ended in late in 2009.

7. Approximately a year after the conclusion of romantic relationship, Ms. Vilnyanskaya began communicating with Mr. Braude by way of email and social media, including Facebook.

8. From approximately April 2011 to present, the communications became increasingly harassing and accusatory.

9. The communications include false allegations that Mr. Braude physically and sexually assaulted Ms. Vilnyanskaya.

10. Mr. Braude has never physically or sexually assaulted Ms. Vilnyanskaya (or threatened to do so) and Ms. Vilnyanskaya is and has always been aware of that fact.

Defamatory Communications

11. Not satisfied with harassing Mr. Braude, Ms. Vilnyanskaya set out on a deliberate path to destroy Mr. Braude's business and personal reputation.

12. "Technical.ly" is an Internet-based trade publication that covers technology and the technology industry in Philadelphia, Baltimore, Brooklyn, Delaware and the District of Columbia. Technical.ly is owned and produced by Technically Media Inc. (<http://technicallymedia.com/>).

13. On or about May 13, 2015, Technical.ly Philly, the Philadelphia-specific edition of the Technical.ly site, published a story entitled “Cofounder Ilya Braude has left CloudMine. He’s also leaving Philly” (<http://technical.ly/philly/2015/05/13/ilya-braude-cloudmine/>). The story profiled Mr. Braude and his relocation from Philadelphia to Baltimore, Maryland.

14. In early October 2016, Ms. Vilnyanskaya made the following series of posts (“Technical.ly Comments”) in the comments section of the Technical.ly Philly story about Mr. Braude:¹

- Or maybe for no reason at all
- This mother fucker raped me for money and status
- I had a Normal dating life and a good job and excellent self esteem people don't take sexual assault seriously enough in this country anyone who would assault a woman or condone this has a serious screw loose. This is second next to murder. I had mild depression and mild anxiety. This guy put me in the hospital. For what? He is a liar. What kind of pieces of shit sells their best friend for money and subjects them to rape and whoever supported him in this because I am a writer or have anxiety and therefore not a full human being. You are not following jewish law or American law. Pay money to my family you psycopath or go to prison. Or use your conscience. I have made some mistakes I am sure but I did not come to this country to be raped and treated like a second class citizen. You already have your citizenship you don't need to marry an uneducated America girl to maintain your status. Or lie to her. If you think I am evil this is all your projection. I didn't nothing but be a good friend lover person and why I have to live the rest of my life with the echo of your abuse I have no idea. Go to prison or tell the truth
- This son of a bitch sexually assaulted me, forced me to quit my job, slandered me lied to everyone then tried to silence me in a precancerous state while going on a Fucking honey moon and blackmailed me with some stupidly loving emails I sent while in post concussion syndrome I have been running to the police for two years while in school and he is relying on the jealous ex girlfriend trope or anxiety disorder to cover up slander sexual assault and abuse. I don't at all like scandal and I almost considered giving this guy a shout out given that we all seem to love jerks so much. But I don't know what else to do. Many people end relationships in friendships and happily move on but what this has to do with sexual assault verbal abuse and black mail I have no idea. Someone

¹ The Comments have been reproduced without correcting grammatical, spelling or punctuation errors.

pulled wires from under my car he rallied an entire community and lied to everyone. Not only did this guy physically assault me he also sent me into emotional rape syndrome. My grandmother g-d rest he sound fed this piece of human garbage.

- This is what a rapist looks like

A true and correct copy of the Technical.ly Comments are attached hereto as Exhibit A.

15. The assertions and implications in the Comments that Mr. Braude sexually assaulted, physically assaulted or physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

16. Ms. Vilnyanskaya knew the Comments were false, or acted with reckless disregard of whether they were false, when she made them.

Ms. Vilnyanskaya's Blog Posts

17. Ms. Vilnyanskaya maintains a blog titled "Kaleidoscope."

18. On October 11, 2016, Ms. Vilnyanskaya made the following post ("First Blog Post") to the Kaleidoscope blog:²

How to Cope with a Predator

in 2008 I met Ilya Braude of Philadelphia through a family friend, I thought that I could trust this man and treated him like family. Our relationship quickly took a turn for the worse I was verbally assaulted, physically assaulted, and slandered. I was then silenced by a lawyer. I was told as I was being assaulted that he would never marry someone as poor as me. I never wanted a high profile case. I tried to go to the police over and over again. There were wires pulled from my vehicle. I am ashamed of what I went through, but I never thought that my best friend would sell me out for some cash.

The initial assault report was filed in the summer of 2014. The family tried to frame me and denied any wrongdoing. Below is a picture of my grandmother. She didn't know that the guy she put me into the hands of, would turn out like this.

² The First Blog Post is reproduced without correcting grammatical, spelling or punctuation errors.



A true and correct copy of the First Blog Post is attached hereto as Exhibit B.

19. The assertions and implications in the First Blog Post that Mr. Braude sexually assaulted, physically assaulted or physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

20. Ms. Vilnyanskaya knew the assertions and implications in the First Blog Post were false, or acted with reckless disregard of whether they were false, when she made them.

21. Later in the day on October 11, 2016, Ms. Vilnyanskaya made the following post (“Second Blog Post”) to the Kaleidoscope blog:³

Beyond the shadow of a doubt

I am concerned for my own safety and the safety of my family, unlike many women who have been killed by their predators, before they could even speak out, I want to document what has happened to me in a space where there cannot be any doubt; where I as the victim of this predator am not being blamed. I don’t know why I waited this long to report, perhaps it was meeting this man at a fairly young age that I really believed that if I let him go he would change for the better. I was wrong. It is never good to be silent about abuse. The abuser simply moves on to another victim and hides his/her true identity for as long as it is necessary for

³ The Second Blog Post is reproduced without correcting grammatical, spelling or punctuation errors.

personal gain. This is how you know you have encountered someone who is truly dangerous. When they are able to hide evil behind a calm demeanor.

A true and correct copy of the Second Blog Post is attached hereto as Exhibit “C.”

22. The First Blog Post and Second Blog post appear immediately adjacent to each other.

23. When read in context, the Second Blog Post states that Mr. Braude physically assaulted Ms. Vilnyanskaya or attempted to do so and continues to be a threat to her physical safety and the physical safety of her family.

24. The defamatory statements in the Second Blog Post are false.

25. Ms. Vilnyanskaya knew the assertions and implications in the Second Blog Post were false, or acted with reckless disregard of whether they were false, when she made them.

26. Later in the day on October 11, 2016, Ms. Vilnyanskaya made the following post (“Third Blog Post”) to the Kaleidoscope blog:⁴

Kids

<https://www.crunchbase.com/person/ilya-braude-2#/entity>

unfortunately, if you let a kid get away with whatever he wants he becomes a predator.

A true and correct copy of the Third Blog Post is attached hereto as **Exhibit D**.

27. The Third Blog Post immediately follows the Second Blog Post.

28. The link included in the Third Blog Post directs the reader to the biography of Mr. Braude. A true and correct copy of the linked biography is attached hereto as **Exhibit E**.

29. The Third Blog Post alone, and read in context with Mr. Braude’s biography and the First Blog Post and Second Blog Post, states that Mr. Braude is a sexual predator and/or that

⁴ The Third Blog Post is reproduced without correcting grammatical, spelling or punctuation errors.

he sexually assaulted, physically assaulted or physically harmed Ms. Vilnyanskaya (or attempted to do these things).

30. The defamatory statements in the Third Blog Post are false.

31. Ms. Vilnyanskaya knew the assertions and implications in the Third Blog Post were false, or acted with reckless disregard of whether they were false, when she made them.

32. On October 14, 2016, Ms. Vilnyanskaya made the following post (“Fourth Blog Post”) to the Kaleidoscope blog:⁵

What is a Sociopath?

1. Superficial Charm
2. No remorse
3. Lack of Empathy
4. Pathological Lying
5. Receives pleasure from hurting others
6. Will do whatever it takes to get ahead, even if it’s severely damaging and hurtful to others
7. Abrupt endings in relationships

How to deal with a sociopath
never let a sociopath know how you feel
always stay on neutral topics, such as the weather
always appear unemotional
If possible, stay away from them entirely

A true and correct copy of the Fourth Blog Post is attached hereto as Exhibit “F.”

33. The Fourth Blog Post immediately follows the Third Blog Post.

34. When read in context, the Fourth Blog Post implies that Mr. Braude is a sociopath.

35. Mr. Braude is not a sociopath.

⁵ The Fourth Blog Post is reproduced without correcting grammatical, spelling or punctuation errors.

36. Ms. Vilnyanskaya knew the assertions and implications in the Fourth Blog Post were false, or acted with reckless disregard of whether they were false, when she made them.

Ms. Vilnyanskaya's Emails

37. On October 12, 2016 @ 6:49 AM, Ms. Vilnyanskaya sent the following email ("First October 12 Email") to Mr. Braude's former employer and other third parties:⁶

you raped me
forced me out of a stable job
isolated me from and ruined my relationships with all of my friends
slandered me
lied
slandered my family
watched me almost die in a car accident with wires pulled from my car by only g-d
knows who
I have been calling ripe crasiss centers and tarign at my own legs for two years you
sick fuck while you are going to france with some prostitute
I would do like my grandmother did and write her a few words but I dont' akways
want tio blame women
you have dishonored my family who took you in and treated you like their own
we had a real doctor in the family and not some skunk who graduate from temple
pay money either directly or in honor of my family
or go to prison
to tell the fucking skank that you are jewish and you are not allowed to rape women
and leave them for dead
I have tried so hard to hold all of it in I've gone through twoi years of therapy and
you know what I learned nothing, you are
a fucking asshole, you are arapist you raped me through coersoion you liued to
everyone you sick fiucke your employers
maybe e ven your family take responsibilty for what you did or get the fuck out of
the country
my grandmother spoon fed you ugly mug you dishonesdt louse
for me to sound like this...g0d I was always positive peaceful took care of you too
kcare of my dad
you have slandered muy wwught
age
intellectual abilities
how can I have any thing? when I am being degraded and ;ied about every day of
my lufe
how coudo ypou fuckign marry this disgusting bitch
and take her on a honeymoon and try to kill upuor best friend for money

⁶ The First October 12 Email has been reproduced without correcting grammatical, spelling or punctuation errors.

I have been doing nothing but caling hospitals for two years WAKE UP YOU
PSYCHO
you are the reason why I Am loike this no one else U ARE THE ONLY REASON
AND THE ONLY TIME I HAVE
BEHAVED THIS WAY BECASE YUO AR E BEjavig like a serial killer

A true and correct copy of the First October 12 Email is attached hereto as Exhibit “G.”

38. The statements in the First October 12 Email that Mr. Braude sexually assaulted, physically assaulted or physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

39. Ms. Vilnyanskaya knew the assertions and implications in the First October 12 Email were false, or acted with reckless disregard of whether they were false, when she made them.

40. On October 12, 2016 @ 6:59 AM, Ms. Vilnyanskaya sent the following email (“Second October 12 Email”) to one of Mr. Braude’s clients:⁷

I tried to send an email earlier and I am not sure if it went through. I want you to know that your employee ilya braude raped me physically and emotionally leaving me to be too sick to even file charges, He has either prepped or not prepped people for this, in either case he is a dangerous sociopathic liar, either that or his new spouse is condoning this, regardless you have a dangerous person on yoru hands. I would upload pictures but I can't embed them into this site, thank you

alla vilnyanskaya
Thanks

A true and correct copy of the Second October 12 Email is attached hereto as Exhibit H.

41. The defamatory statements in the Second October 12 Email that Mr. Braude sexually assaulted, physically assaulted or physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

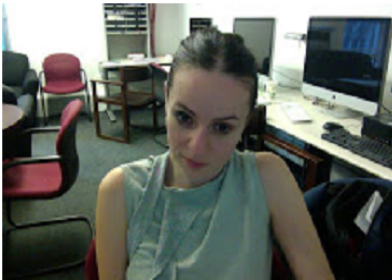
⁷ The Second October 12 Email has been reproduced without correcting grammatical, spelling or punctuation errors.

42. Ms. Vilnyanskaya knew the assertions and implications in the Second October 12 Email were false, or acted with reckless disregard of whether they were false, when she made them.

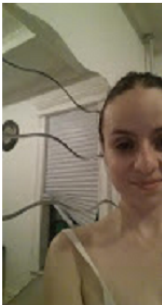
43. On October 12, 2016 @ 7:48 AM, Ms. Vilnyanskaya sent the following email (“Third October 12 Email”) to Mr. Braude’s former employer and other third parties:

This is what I am supposed to look like, when I am not being assaulted (and this is actually after)

3 attachments



me 1.jpg
219K



me 2.jpg
38K



me 3.jpg
239K

A true and correct copy of the Third October 12 Email is attached hereto as Exhibit I.

44. The defamatory statements in the Third October 12 Email that Mr. Braude sexually assaulted, physically assaulted, physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

45. Ms. Vilnyanskaya knew the assertions and implications in the Third October 12 Email were false, or acted with reckless disregard of whether they were false, when she made them.

46. On October 12, 2016, Ms. Vilnyanskaya sent the following email (“Fourth October 12 Email”) to Mr. Braude’s former employer:

This is what the confounded ilya braude of your organization did for money

----- Forwarded message -----

From: **Alla Vilnyansky** <av2533@columbia.edu>

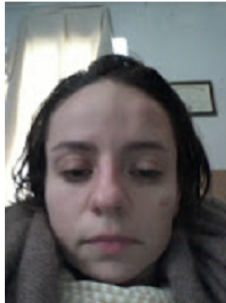
Date: Wednesday, October 12, 2016

Subject: This is what you did to me for money

To: ilya@ilyabraude.com

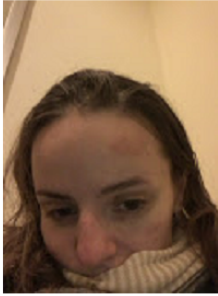
[Quoted text hidden]

2 attachments



20150305_092942.jpg
200K

20150306_132140.jpg
254K



A true and correct copy of the Fourth October 12 Email is attached hereto as Exhibit J.⁸

47. Ms. Vilnyanskaya also sent the Fourth October 12 to Jose Viera of the Philadelphia Police department.

48. The defamatory statements and allusions to the photos in the Fourth October 12 Email state directly, and imply indirectly, that Mr. Braude sexually assaulted, physically assaulted, physically harmed or otherwise engaged in any wrongdoing are false.

49. Ms. Vilnyanskaya knew the assertions and implications in the Fourth October 12 Email were false, or acted with reckless disregard of whether they were false, when she made them.

50. On November 19, 2016 @ 5:10 PM, Ms. Vilnyanskaya sent the following email (“November 19 Email”) to Mr. Braude’s current employer:⁹

I want you to know that either through his own doing or the brainwashing of his family and the woman who is currently using him for a meal ticket, Alissa (BRAude?) Ilya BRAude has raped, gaslighted and threatened me for over the years. I come from a good family, my grandmother was a physician, I have called the police, pleaded with him for him to take responsibility for his actions and have received nothing but lies and verbal assault. The fact that this type of individual would work for a health care company is an abomination and a slap in the face to someone that he abused like a psychopathic animal. The guy needs severe mental health treatment.. Please fire him.

⁸ The photographs in the Fourth October 12 Email appear to show contusions or lacerations on the subject’s forehead and face.

⁹ The November 19 Email is reproduced without correcting grammatical, spelling or punctuation errors.

A true and correct copy of the November 19 Email is attached hereto as Exhibit K.

51. The defamatory statements and implied meanings in the November 19 Email that Mr. Braude sexually assaulted, physically assaulted, physically harmed Ms. Vilnyanskaya or otherwise engaged in any other wrongdoing are false.

52. Ms. Vilnyanskaya knew the assertions and implications in the November 19 Email were false, or acted with reckless disregard of whether they were false, when she made them.

53. On November 20, 2016 @ 5:12 PM, Ms. Vilnyanskaya sent the following email (“November 20 Email”) to Mr. Braude’s current employer:¹⁰

I just want you to know that I have been stalked harassed, sexually assaulted and threatened by one of your employees Ilya Braude.

He has degraded me for taking medicine for anxiety and depression, threatened to kill me and has refused to take responsibility for any of his actions. Because he has forced me into bankruptcy through lies isolation and verbal abuse there is very little I can do in the way of hiring a lawyer.

Alla

A true and correct copy of the November 20 Email is attached hereto as Exhibit L.

54. The defamatory statements in the November 20 Email that Mr. Braude sexually assaulted, physically assaulted, physically harmed Ms. Vilnyanskaya (or attempted to do any of these things) or otherwise engaged in any wrongdoing are false.

55. Ms. Vilnyanskaya knew the assertions and implications in the November 20 Email were false, or acted with reckless disregard of whether they were false, when she made them.

56. Upon information and belief, Ms. Vilnyanskaya has made, and continues to make, additional statements on the Internet and to third parties (“Additional Statements”) that Mr. Braude sexually or physically assaulted her, all of which are false.

¹⁰ The November 20 Email is reproduced without correcting grammatical, spelling or punctuation errors.

57. Upon information and belief, the Additional Statements will be identified in discovery.

58. As a direct and proximate result of the Comments, First Blog Post, Second Blog Post, Third Blog Post, Forth Blog Post, First October 12 Email, Second October 12 Email, Third October 12 Email, Fourth October 12 Email, November 19 Email, November 20 Email and the Additional Statements (collectively, the “Defamatory Communications”), Mr. Braude has suffered, and continues to suffer, general and special damages as a result of the Vilnyanskaya’s statements and communications.

59. All of the Defamatory Communications were published to third parties.

COUNT I
DEFAMATION
(Ms. Alla Vilnyanskaya)

60. Plaintiff hereby incorporates by reference the previous paragraphs of this Complaint as though set forth at length herein.

61. The Defamatory Communications directly state and indirectly imply that Mr. Braude sexually assaulted, physically assaulted and physically harmed Ms. Vilnyanskaya (or threatened to do so), that Mr. Braude continues to threaten Ms. Vilnyanskaya’s physical safety and that of her family and that Mr. Braude is a sociopath or “predator.”

62. The Defamatory Communications tend to expose Mr. Braude to public scorn, hatred, contempt or ridicule.

63. The Defamatory Communications discourage others in the community from having a good opinion of or associating with Mr. Braude.

64. The Defamatory Communications are false.

65. Ms. Vilnyanskaya made the Defamatory Communications with the intention of injuring Mr. Braude's reputation.

66. Ms. Vilnyanskaya was negligent in ascertaining the truth of the Defamatory Communications.

67. Ms. Vilnyanskaya knew or should have known that the Defamatory Communications were false when she made them.

68. Ms. Vilnyanskaya acted with reckless disregard as to whether the Defamatory Communications were false.

69. Mr. Braude is a private figure.

70. As a direct and proximate result of Ms. Vilnyanskaya making the Defamatory Communications, Mr. Braude has suffered general and special damages.

WHEREFORE, Plaintiff, respectfully requests that the Court:

(1) enter judgment in his favor and against Defendant for unliquidated money damages in excess of \$150,000.00, together with punitive damages, post-judgment interest and costs;

(2) issue an order declaring that the assertions contained in the Defamatory Communications that Mr. Braude sexually assaulted, physically assaulted and physically harmed Defendant (or threatened to do so), that Plaintiff continues to threaten Defendant's physical safety and that of her family and that Plaintiff is a "sociopath" or "predator" are false;

(3) issue an order directing Defendant to immediately remove the Defamatory Communications from the Internet wherever they exist, whether on private or public websites;

(4) pay for one year of reputation monitoring for benefit of Plaintiff to ensure that the items listed have all been removed and do not appear again;

(4) issue an order permanently enjoining Defendant from making statements about Plaintiff in any capacity; and

(5) award all other relief the Court deems just.

COUNT II
INVASION OF PRIVACY - FALSE LIGHT
(Ms. Alla Vilnyanskaya)

71. Plaintiff hereby incorporates by reference the previous paragraphs of this Complaint as though set forth at length herein.

72. made the Defamatory Communications because of her ill will toward Mr. Braude.

73. Ms. Vilnyanskaya made the Defamatory Communications in order to interfere with the interests of Mr. Braude and to tarnish his reputation.

74. The Defamatory Communications place Mr. Braude in a false light.

75. The Defamatory Communications are highly offensive to a reasonable person.

76. Ms. Vilnyanskaya knew that the Defamatory Communications were false or acted in reckless disregard as to whether the Defamatory Communications were false.

77. Ms. Vilnyanskaya knew that the Defamatory Communications would place Mr. Braude in a false light.

78. As of result of Ms. Vilnyanskaya's publication of the Defamatory Communications, Mr. Braude has suffered and will suffer significant general and special damages.

WHEREFORE, Plaintiff, respectfully requests that the Court:

(1) enter judgment in his favor and against Defendant for unliquidated money damages in excess of \$150,000.00, together with punitive damages, post-judgment interest and costs;

(2) issue an order declaring that the assertions contained in the Defamatory Communications that Mr. Braude sexually assaulted, physically assaulted and physically harmed

Defendant (or threatened to do so), that Plaintiff continues to threaten Defendant's physical safety and that of her family and that Plaintiff is a "sociopath" or "predator" are false;

(3) issue an order directing Defendant to immediately remove the Defamatory Communications from the Internet wherever they exist, whether on private or public websites;

(4) pay for one year of reputation monitoring for benefit of Plaintiff to ensure that the items listed have all been removed and do not appear again;

(5) issue an order permanently enjoining Defendant from making statements about Plaintiff in any capacity; and

(6) award all other relief the Court deems just.

COUNT III
EQUITABLE RELIEF
(Ms. Alla Vilnyanskaya)

79. Plaintiff hereby incorporates by reference the previous paragraphs of this Complaint as though set forth at length herein.

80. Mr. Braude continues to be injured by the continued publication of the Defamatory Communications.

81. The injury caused to Mr. Braude cannot be adequately remedied with legal damages.

WHEREFORE, Plaintiff, respectfully requests that the Court:

(1) issue an order declaring that the assertions contained in the Defamatory Communications that Mr. Braude sexually assaulted, physically assaulted and physically harmed Defendant (or threatened to do so), that Plaintiff continues to threaten Defendant's physical safety and that of her family and that Plaintiff is a "sociopath" or "predator" are false;

DEMAND FOR JURY TRIAL

The Plaintiff, by his undersigned attorney, hereby demands a jury trial as to all issues triable by a jury.

Respectfully submitted,

/s/
Edward S. Robson, Esq.